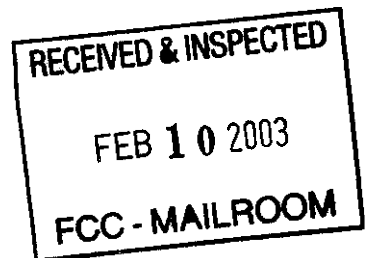


Federal Communication Commission

Before the
Federal Communications Commission
Washington, D.C. 20554



In the matter of)
)
Amendment of Section 73.202(b))
FM Table of Allotment,)
FM Broadcast Stations,)
(Bridgeton and Pennsauken, New Jersey)

MB Docket NO. 02-382
RM-1061.5

REPLY COMMENTS TO
NOTICE OF PROPOSED RULEMAKING

Adopted: December 13, 2002

Released December 16, 2002

Comments Date: February 10, 2003
Reply comments Date: February 25, 2003

By: **David C. Weston**, private citizen and prior student member of WHHS, FM

Dear Commission Members:

I respectfully request that you reject the above captioned proposed rulemaking and that you do so in and for the public interest of broadcasting. I submit the following facts to you for consideration:

1. Channel 300 (107.9 Mhz.) is currently being fully utilized by the School District of Haverford Township, 1801 Darby Road, Havertown, PA. 19083.
2. Haverford Township and their non-commercial FM station have been continuously licensed as a broadcast station since 1948. ~~Regular~~ broadcasting began on December 6, 1949.

3. During these FIFTY-SIX years, the station **has** been managed by the school district but operated entirely by the high school's student member staff.
4. WHHS represents the oldest high school operated FM station in the United States today.
5. **WHHS** was originally licensed for channel 207 (89.3 Mhz.) and was required by the Commission to relocate to 107.9 Mhz (circa 1990) in apparent violation of the Commission rules at that time.
6. Requiring WHHS to again relocate within the FM frequency spectrum would represent an extreme financial hardship to the not-for-profit School District of Haverford Township and would not result in the highest and best use of the vacated channel.
7. The costs associated with granting the proposed rulemaking and requiring **WHHS** to change frequency would result in the failure of the student station to continue broadcasting.
8. The proposed rulemaking, if granted, would ~~cause~~ a time-honored loss of a national treasure.
9. By refusing the rulemaking the Commission will ~~reaffirm~~ the value of educational broadcasting and recognize the decades of accomplishments by the School District of Haverford Township, the devoted staff members, and the alumni graduates.

Chairman. Commission ~~Members~~ and FCC staff

I thank you for taking the time today to consider an opposing point of view to the proposed rulemaking change. I am neither experienced in communications law nor Commission business, please forgive me. I do know something about broadcasting, radio, and WHHS.

I became a radio amateur in Pennsylvania at ten years of age in 1961. I lived in Havertown and later became a student member of WHHS from 1964 to 1968. During my tenure there and at 16 years of age, I earned my First Class radiotelephone license. I listened to WHHS **as** a pre-teen, became ~~part~~ of the station's operations **as** a high school student, and now assist **as** an alumnus.
